

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

Criminal No. 24-96

ANDREW KALYL FOXX  
a/k/a James Andrew Liles  
a/k/a Andrew James Liles

**GOVERNMENT’S POSITION WITH RESPECT TO SENTENCING FACTORS**

AND NOW comes the United States of America, by its attorneys, Eric G. Olshan, United States Attorney for the Western District of Pennsylvania, and Heidi M. Grogan, Assistant United States Attorney for said District, and respectfully files the following Position with Respect to Sentencing Factors:

1. The Government has reviewed the final Presentence Investigation Report (“PSIR”) prepared for Andrew Kalyl Foxx by United States Probation Officer Christina Ferri. Counsel for the government has conferred with Officer Ferri and defendant’s counsel, Michael Ovens, in a good faith effort to resolve any disputed matters.

2. The Government hereby states that it has no objections, additions, and/or modifications to the Report.

3. The United States intends to seek restitution for the minor victim in an amount of not less than \$3,000 and anticipates that the minor victim and a parent likely will present an oral victim impact statement at the sentencing hearing. Should the government receive more

information on either of these matters, the United States will promptly forward such information.

Respectfully submitted,

ERIC G. OLSHAN  
United States Attorney

/s/ Heidi M. Grogan  
HEIDI M. GROGAN  
Assistant United States Attorney  
PA ID No. 203184